

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

CITY OF DETROIT, MICHIGAN

Chapter 9
Case No. 13-53846-swr
Hon. Steven W. Rhodes

**CERTIFICATION PURSUANT TO THE COURT'S ORDER GRANTING
MOTION TO COMPEL FULL CLAWBACK OF DEBTOR'S
DOCUMENT PRODUCTION AND RELATED RELIEF**

Lynn M. Brimer hereby certifies, pursuant to 28 U.S.C. § 1746, as follows:

1. I am over the age of 18 and am a partner with the law firm of Strobl & Sharp ("Strobl"), counsel for the Retired Detroit Police Members Association.

2. On May 7, 2014, Strobl received the Debtor's May 6, 2014 document production (the "Production").

3. In accordance with the Court's *Order Granting Motion to Compel Full Clawback of Debtor's Document Production and Related Relief* [Docket No. 4710] (the "Order"), on May 14, 2014, Strobl sent the Production to the Debtor's counsel Jones Day at 51 Louisiana Avenue, N.W., Washington, D.C. 20001, Attn: Mary Hale, as specified in the Order, by overnight delivery. A true and correct copy of the May 15, 2014 letter to Mary Hale enclosing the Production is attached hereto as Exhibit "A".

4. Strobl did not create any electronic or physical copies of the Production or any portion of the Production, nor did Strobl create any work product reflecting the contents of the documents in the Production. In fact, Strobl never once reviewed the discovery. Accordingly, Strobl has complied with the provisions of paragraph 2 of the Court's Order.

I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on this 15th day of May, 2014

/s/ Lynn M. Brimer
Lynn M. Brimer, Esq.

EXHIBIT A



ATTORNEYS & COUNSELORS

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May 15, 2014

VIA FEDERAL EXPRESS

Mary Hale
Jones Day
51 Louisiana Ave., N.W.
Washington, D.C. 20001

RE: City of Detroit, Chapter 9 Case No. 13-53846-SWR

Dear Ms. Hale:

In accordance with the Bankruptcy Court's *Order Granting Motion to Compel Full Clawback of Debtor's Document Production and Related Relief* [Docket No. 4710], enclosed please find the hard drive containing the City of Detroit's document production (the "Production") received by Strobl & Sharp, P.C., on behalf of the Retired Detroit Police Members Association on May 7, 2014.

This letter certifies that the hard drive was never opened and thus, no copies of anything contained on the hard drive were ever made.

STROBL & SHARP, P.C.

A handwritten signature in black ink, appearing to read "Lynn M. Brimer".

Lynn M. Brimer

LMB/kva
Enclosure (hard drive/case/cords)